

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES,

Plaintiff,

v.

SOUTHERN DELAWARE CENTER  
FOR CHILDREN AND FAMILIES, INC.  
FRANCIS A. OGUNDARE, CAROLYN  
WILLIAMS, REVEREND LEON  
WILLIAMS, WILLIAM B. DUFFY,  
WALLACE F. HANDY, KATHERINE  
H. LEWIS, DEBORAH WASHINGTON  
and ROSAMAE I. SMITH,

Defendants.

Civil Action No. 05-809

**MOTION FOR A TEMPORARY RESTRAINING ORDER, OR, IN THE  
ALTERNATIVE, A PRELIMINARY INJUNCTION**

Plaintiff United States Department of Health and Human Services ("DHHS") hereby moves pursuant to Fed. R. Civ. P. 65 for a temporary restraining order, or, in the alternative, a preliminary injunction. In support of this Motion, the Court is respectfully referred to the accompanying brief. A proposed Order consistent with this Motion is attached hereto as Exhibit A.

DATED: November 23, 2005

Respectfully Submitted,

COLM F. CONNOLLY  
United States Attorney

By: /s/ Seth M. Beausang  
Seth M. Beausang (I.D. No. 4071)  
Assistant United States Attorney  
Attorney for the United States  
The Nemours Building  
1007 Orange Street, Suite 700  
P.O. Box 2046  
Wilmington, DE 19899-2046  
(302) 573-6277  
seth.beausang@usdoj.gov